

6/16/04

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

REPLY COMMENTS, FCC, MM DOCKET 99-325

Submitted by: WUMB-FM
University of Massachusetts Boston
100 Morrissey Blvd.
Boston, MA 02125-3393

Dear Ms. Dortch:

As general manager of the only full-time folk music radio station in the country, and of the first non-commercial radio station in New England to sign on with HD Radio in February 2002, I wanted to explain to you why I am eager to see the Commission approve Supplemental Audio Channel capacity.

As a relatively lower-powered non-commercial public radio station in a large metropolitan market, I can attest to listener complaints about our old analog transmission system. But, our listeners in weak signal areas have endured poor signal quality because of our unique programming. HD Radio's improved sound quality and elimination of multi-path interference was the deciding factor in our prompt move to digital a few months ago. Engineering tests of our new digital signal have demonstrated that listeners will enjoy substantially improved reception when they transition to a digital receiver.

However, the most exciting opportunity that exists with HD Radio is the capability to provide additional audio programming on a Supplemental Audio Channel (SAC). WUMB-FM and our Licensee, the University of Massachusetts, firmly believe that use of SAC is vital to improving our public service, enabling us to expand programming options that are otherwise unserved in our broadcast area.

WUMB-FM strives to provide high-quality cultural programming to listeners. We do this with an umbrella format called "folk music" – a format comprising several different genres of music including singer-songwriter, blues, bluegrass, traditional folk, Cajun, zydeco, Celtic and World music. While our primary daytime programming mixes all of these genres, evenings and weekends present blocks of single-genre programs for those listeners who prefer one type of music to another. Even so, we often hear from our listeners who are frustrated when the music they enjoy most is not given enough air-time. A Supplemental Audio Channel would allow for more genre-specific, and perhaps language-specific, cultural programs serving other populations. We would also be able to provide more listening opportunities to current listeners. In short, SAC would provide us

with a cost-effective means to further expand our diverse programming options, thereby improving service to current listeners as well as providing an expanded service to a wider audience.

As an integral part of one of the five campuses of the University of Massachusetts, WUMB is obligated to assist the institution to fulfill its mission. We do this:

- by helping to improve the quality of life in our broadcast area and by contributing to the rich and diverse cultural life of a major American city,
- by sponsoring and supporting cultural diversity through partnerships and economic development initiatives with local organizations such as the Massachusetts Cultural Council, the New England Foundation for the Arts, and the Boston Area Coffeehouse Association,
- by helping ethnic and international communities to articulate and celebrate their cultural values and identities and by recognizing the contributions and achievements of members of these communities, and
- by educating artists, archivists, teachers and others whose lifelong contribution will enrich the culture and environment of the urban populace.

Supplemental Audio Channel authorization would allow us to further fulfill our obligations as a department of the University of Massachusetts Boston and would provide us with the resources and capacity to develop new partnerships with multi-cultural and other organizations.

However, additional capacity to expand public service could be a futile exercise if public radio stations such as WUMB are not able to fund these additional activities. Beyond authorizing the use of Supplemental Audio Channels, the community would be well served by the FCC if it allows non-commercial educational stations flexibility to generate revenue in ways not currently available to us.

The dawning age of HD Radio brings with it great promise for all radio listeners and an ability for non-commercial educational radio to provide better service to its listeners and the public-at-large. A Supplemental Audio Channel is a vital piece of this new future, and WUMB-FM urges the FCC to authorize SAC as soon as possible.

Respectfully submitted,
Patricia A. Monteith
General Manager
WUMB Public Radio Network
University of Massachusetts